

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CYNTISHA STEWART, TERRY BROWN,  
EDUARDO CANTIZZANO, LISA  
HILL-GREEN, THERESA HILL, YOLANDA  
JONES, MICHAEL CLARK, and  
CHRISTOPHER PETERSON,

*Plaintiffs,*

v.

LEXISNEXIS RISK DATA RETRIEVAL  
SERVICES, LLC a/k/a LexisNexis Risk Data  
Management and LEXISNEXIS RISK  
SOLUTIONS, INC.,

*Defendants.*

Civil Action No.: 3:20-cv-903-JAG

**PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF RULE 23(b)(3) SETTLEMENT**

Plaintiffs move, pursuant to Federal Rule of Civil Procedure 23, for final approval of the Rule 23(b)(3) common-fund settlement of this class action. As explained below, the settlement is fair, reasonable, and adequate under any measure, resulted from arm's-length and contentious negotiations, resolves hard-fought claims on behalf of thousands of consumers and provides significant prospective benefit in exchange for only modest class member consideration. For the reasons set forth in the accompanying Memorandum of Law, the Court should grant final approval pursuant to Federal Rule of Civil Procedure 23(e).

Dated: July 7, 2022

Respectfully submitted,

**CYNTISHA STEWART, et. al.**

By: /s/ Leonard A. Bennett

Leonard A. Bennett, VSB #37523  
Craig C. Marchiando, VSB #89736  
**CONSUMER LITIGATION ASSOCIATES, P.C.**  
763 J. Clyde Morris Blvd., Suite 1-A  
Newport News, VA 23601  
(757) 930-3660 – Telephone  
(757) 930-3662 – Facsimile  
Email: [len@clalegal.com](mailto:len@clalegal.com)  
Email: [craig@clalegal.com](mailto:craig@clalegal.com)

Kevin A. Dillon, VSB # 93475  
Drew Sarrett, VSB #81658  
**CONSUMER LITIGATION ASSOCIATES, P.C.**  
626 E Broad Street, Suite 300  
Richmond, VA 23219  
(804) 905-9904 – Telephone  
(757) 930-3662 – Facsimile  
Email: [kevin@clalegal.com](mailto:kevin@clalegal.com)  
Email: [drew@clalegal.com](mailto:drew@clalegal.com)

Kristi C. Kelly, VSB #72791  
Andrew J. Guzzo, VSB #82170  
Casey Nash, VSB #84261  
J. Patrick McNichol, VSB #92699  
**Kelly Guzzo, PLC**  
3925 Chain Bridge Road, Suite 202  
Fairfax, VA 22030  
(703) 424-7572 – Telephone  
(703) 591-0167 – Facsimile  
Email: [kkelly@kellyguzzo.com](mailto:kkelly@kellyguzzo.com)  
Email: [aguzzo@kellyguzzo.com](mailto:aguzzo@kellyguzzo.com)  
Email: [casey@kellyguzzo.com](mailto:casey@kellyguzzo.com)  
Email: [pat@kellyguzzo.com](mailto:pat@kellyguzzo.com)

James A. Francis  
John Soumilas *Pro Hac Vice*  
Jordan M. Sartell  
FRANCIS & MAILMAN, P.C.  
Land Title Building  
100 S. Broad Street, Suite 1902  
Philadelphia, PA 19110

(214) 735-8600 – Telephone  
(215) 940-8000 – Facsimile  
Email: [jfrancis@consumerlawfirm.com](mailto:jfrancis@consumerlawfirm.com)  
Email: [jsoumilas@consumerlawfirm.com](mailto:jsoumilas@consumerlawfirm.com)  
Email: [jsartell@consumerlawfirm.com](mailto:jsartell@consumerlawfirm.com)

Eleanor Michelle Drake  
BERGER MONTAGUE  
1229 Tyler Street NE, Suite 205  
Minneapolis, MN 55413  
Email: [emdrape@bm.net](mailto:emdrape@bm.net)

Keith J. Keogh  
William M. Sweetnam  
Keogh Law, LTD.  
55 W. Monroe St., Ste. 3390  
Chicago, IL 60603  
312.374.3403 (Direct)  
312.726.1092 (Main)  
312.726.1093 (Fax)  
Email: [Keith@KeoghLaw.com](mailto:Keith@KeoghLaw.com)

AJ Stecklein  
Michael Rapp  
Matthew Robertson  
Stecklein & Rapp Chartered  
748 Ann Avenue, Suite 101  
Kansas City, Kansas 66101

*Counsel for Plaintiffs*